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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

JIHAD A. HACHEM,

Plaintiff,

v.

GENERAL ELECTRIC COMPANY,  
JEFFREY R. IMMELT, JEFFREY S.  
BORNSTEIN, JOHN L. FLANNERY, JAMIE  
MILLER, AND KEITH S. SHERIN,

Defendants.

LEAD CASE: No. 17-CV-8457 (JMF)

Hon. Jesse M. Furman

CLASS ACTION

JURY TRIAL DEMANDED

STIPULATION AND ~~PROPOSED~~ ORDER REGARDING  
LEAD PLAINTIFF'S FILING OF A SECOND AMENDED CONSOLIDATED  
CLASS ACTION COMPLAINT

WHEREAS, on January 19, 2018, the Court appointed Arkansas Teacher Retirement System as Lead Plaintiff and Labaton Sucharow LLP as Lead Counsel for the Class (Dkt. No. 52);

WHEREAS, on March 20, 2018, Lead Plaintiff timely filed its Consolidated Amended Class Action Complaint (the "Complaint") (Dkt. No. 73);

WHEREAS, Former Employee 3 ("FE-3"), whose statements appear at ¶¶ 131-134 of the Complaint, has recently contacted Lead Counsel and requested to be removed from the Complaint;

WHEREAS, Lead Counsel accordingly intends to amend the Complaint by removing the allegations attributable to FE-3;

WHEREAS, Defendants reserve all rights to seek discovery from and related to FE-3 and FE-3's allegations in the Complaint;

WHEREAS, Exhibit A hereto is a blackline of the Complaint that reflects all instances in which allegations attributable to FE-3 have been removed;

WHEREAS, Lead Counsel informed counsel for Defendants of their intent to amend the Complaint and provided Defendants' counsel with Exhibit A, and counsel for Defendants do not object to the proposed amendment of the Complaint;

WHEREAS, this amendment to the Complaint should not impact the briefing schedule in effect;

IT IS HEREBY STIPULATED AND AGREED, by the Parties, through their undersigned counsel, subject to Court approval, as follows:

1. Lead Plaintiff promptly will file a Second Amended Consolidated Class Action Complaint reflecting the changes in Exhibit A.

DATED: April 9, 2018

**LATHAM & WATKINS LLP**

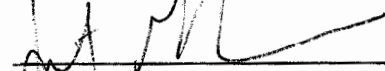


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Respectfully submitted,

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*Additional Counsel for Lead Plaintiff and  
the Proposed Class*

SO ORDERED.

Dated: April 10, 2018  
New York, New York



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HON. JESSE M. FURMAN  
United States District Judge